IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA RALEIGH DIVISION

ALLIANCE FUNDING GROUP)
Plaintiff,)
v.) Case No. 5:23-cv-00074-M-BM
TORCHLIGHT ACADEMY SCHOOLS, LLC, and DONNIE MCQUEEN,)))
Defendants.)))

MOTION FOR DEFAULT JUDGMENT

COMES NOW, Plaintiff Alliance Funding Group ("Plaintiff"), by and through its undersigned counsel, and pursuant to Federal Rule of Civil Procedure 55(b), moves this Court for entry of a default judgment against Defendants Torchlight Academy Schools, LLC, and Donnie McQueen ("Defendants") based on Defendants failure to plead or otherwise defend against the Complaint. Having failed to respond within the time provided by the Federal Rules of Civil Procedure, Defendants are now in default and are liable for the amount prayed for in the Verified Complaint. A memorandum brief in support of this Motion is filed concurrently herewith.

WHEREFORE, Plaintiff requests the following relief:

- 1. This Court enter an Order finding Defendants in default;
- 2. This Court enter judgment in favor of Plaintiff and against Defendants, in the amount of \$218,661.86, plus attorney's fees and expenses in the amount \$4,791.50, for a total judgment of \$223,453.36; and
 - 3. Such other and further relief as the Court deems equitable and just.

DATED this the 31st day of March, 2023.

Respectfully Submitted,

/s/ R. Andrew Hutchinson

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Plaintiff Alliance Funding Group

CERTIFICATE OF SERVICE

This is to certify that the foregoing MOTION FOR DEFAULT JUDGMENT has been duly served by the Court's CM/ECF system on all counsel of record and the parties who may access this filing through that system.

This the 31st day of March, 2023.

Respectfully submitted,

/s/ R. Andrew Hutchinson

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